

**Virgil C. Summer Unit 1 Focused Engineering Inspection
Initial Information Request**

Inspection Procedure: 71111.21N.04, "Age-Related Degradation," dated December 15, 2023 (ADAMS ML23318A426)

Inspection Dates: Information Gathering Week: February 17, 2025
Preparation Week: June 2, 2025
Onsite Week 1: June 9, 2025
Onsite Week 2: June 23, 2025

Inspection Report: 05000395/2025010
(Standalone Inspection Report)

Inspectors: Adam Ruh (Lead/Mechanical), Teh-Chiun Su (Electrical), and Chase Franklin (Mechanical)

The purpose of this letter is to notify you that three inspectors from Region II will conduct an inspection at your site in accordance with Inspection Procedure 71111.21N.04, "Age-Related Degradation." The inspection will evaluate the implementation of the programs regarding age related degradation of SSCs are identified and addressed in a manner that provides reasonable assurance of the safe operation of Virgil C. Summer Nuclear Station. The inspectors will select samples of components that are risk significant and within the scope of the inspection procedure.

On February 17, 2025, Mr. Adam Ruh, a Senior Reactor Inspector from the NRC's Region II office, will begin the inspection with an information gathering visit to the site. The purpose of the information gathering visit is to become familiar with the station maintenance, surveillance, testing, inspection, and condition monitoring programs, become familiar with plant layout, support identification of structures, systems, and components (SSCs) that will be reviewed during the inspection, and, as necessary, obtain plant specific site access training and badging for unescorted site access. An initial list of documents that the team will review during the information gathering visit are listed in enclosure 1.

Enclosure 1 lists documents that are needed prior to the information gathering visit. Please provide the referenced information to the Region II office by February 10, 2025. Additional documents may be requested during the information gathering visit. The additional information should be provided to the Inspectors in the Region II office by May 26, 2025.

For SSCs that the inspection will review, an initial list of the documents the team will review during the conduct of the inspection are listed in enclosure 2. The team leader will contact you with identified SSCs. Also, personnel should be available at the site during the inspection who are knowledgeable regarding maintenance, surveillance, testing, inspection, and condition monitoring programs.

During the information gathering visit, Mr. Ruh will also discuss the following inspection support administrative details: (1) availability of knowledgeable plant engineering and licensing personnel to serve as points of contact during the inspection, (2) method of tracking inspector requests during the inspection, (3) availability of licensee computer access, (4) working space, (5) arrangements for site access, and (6) other applicable information. During this visit, we would like to identify the component samples for this inspection. We'd like to meet with Aging Program specialists to discuss the upcoming inspection and our sample selection process. We request the working space have a telephone, wireless internet access, access to station procedures and corrective action program documents, and a printer. We will also need an area available for conducting interviews.

In accordance with 10 CFR 2.390 of the NRC rules and practices, a copy of this letter and its enclosures will be available electronically for public inspection in the NRC public document room or from the publicly available records (PARS) component of NRC's document system (ADAMS).

ADAMS is accessible from the NRC Web site.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Adam Ruh, the team leader, in the Region 2 Office at 404-997-4669 or by email at adam.ruh@nrc.gov.

Sincerely,

Anthony Masters, Chief
Engineering Branch 1
Division of Operating Reactor Safety

PAPERWORK REDUCTION ACT STATEMENT

This letter contains voluntary information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). The burden to the public for these information collections is estimated to average 60 hours per response. Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: O-1F13, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) Office of Management and Budget, Washington, DC 20503.

Public Protection Notification

The NRC may not conduct nor sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

Enclosure 1: Documents requested for information gathering visit:

The documents and information requested below should generally be made available to the inspection team for the team's use both on-site and off-site during the information gathering visit. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below.

1. list of 50.65 (a)(1) SSCs and their most recent (a)(1) evaluation since January 1, 2019
2. list of corrective action documents associated with maintenance rule functional failures since January 1, 2019 (including brief description and origination date)
3. most recent evaluation of maintenance effectiveness required per 10 CFR 50.65(a)(3)
4. maintenance rule scoping and performance criteria document
5. list of preventative maintenance deferrals and preventative maintenance change requests since January 1, 2019
6. equipment reliability characterization and preventative maintenance program procedures
7. list of Title 10 CFR 21 Reports applicable to the site since January 1, 2019
8. list of corrective action documents associated with component failures, or tagged with "aging", "age-related", "wear", "accelerated wear", "abnormal wear", "accelerated degradation", "abnormal degradation", "corrosion", "degradation", "leak", etc.
9. list of corrective action documents with operability determinations since January 1, 2019.
10. list of risk-significant long-lived passive SSCs (for licensees in the period of extended operation (PEO))
11. aging management programs (AMPs) and any plant-specific or industry operating experience reviews that have been used to update aging management activities (for licensees in the period of extended operation)
12. list of top 100 most risk-significant structures and components. If possible, designate the component as active or passive in the risk ranking
13. list of RISC-1, RISC-2, and RISC-3 SSCs (for licensees that implement 10 CFR 50.69)
14. safety significant functions identified during the RISC categorization process, and alternative treatment requirements (for licensees that implement 10 CFR 50.69)
15. last feedback and process adjustment required per 10 CFR 50.69(e)(1) (for licensees that implement 10 CFR 50.69)
16. site specific probabilistic risk assessment (PRA) identifying risk-significant functions
17. word-searchable current version of the station Updated Final Safety Analysis Report (UFSAR), Technical Specifications (TS), Technical Requirements Manual (TRM) (or equivalent), including applicable bases documents.
18. list of systems (system numbers/designators and corresponding names)
19. current version of the station Quality Assurance Program Document
20. list of issues (with descriptions) under review by plant health committees or equipment reliability groups (such as equipment reliability heat maps)
21. any self-assessments or QA assessments of maintenance rule or aging management programs (performed since January 1, 2019).

Enclosure 2: Documents Requested for Inspection

The team lead will identify samples (i.e., structures and components) after the information gathering visit. The documents and information requested below should generally be made available to the inspection team for the team's use both onsite and offsite during the inspection. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hardcopy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all the listed documents. In addition, your plant-specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below for each sample.

For each sample SSCs identified during the information gathering week:

1. list of corrective action documents for the last 10 years
2. maintenance, surveillance, testing, inspection, and condition monitoring testing requirements, acceptance criteria, and periodicities
3. bases documents associated with maintenance, surveillance, testing, inspection, and condition monitoring testing requirements, acceptance criteria, and periodicities
4. last two years of maintenance, surveillance, testing, inspection, and condition monitoring testing results. For periodicities greater than 2 years, the last two test results.
5. any self-imposed or vendor recommendations
6. any relevant vendor manuals
7. if available,
 - a. equipment reliability category/characterization (e.g., non-critical, run-to-maintenance, etc).
 - b. preventative maintenance templates for the maintenance strategy
 - c. system design basis documents and the specific Updated Final Safety Analysis Report section that describes the function
 - d. PI&Ds and electrical one-line drawings
 - e. control circuit drawings
 - f. design/procurement specifications
 - g. list of applicable modifications for the component